

**Federal Defenders
OF NEW YORK, INC.**

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March 3, 2023

BY ECF & E-MAIL

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Ysenni Gomez, 22-cr-526-NSR

Dear Honorable Judge Román:

I write to respectfully request that you modify Ms. Gomez's bond conditions to permit her to participate in a pharmacy technician class through Hostos Community College.

Ms. Gomez has been out on strict release conditions for nearly five months since October 7, 2022, when she satisfied all the bond conditions. She has been fully compliant with all her release conditions. She is currently under home detention. She is hoping to be productive while under home detention and wishes to participate in a pharmacy technician class. The next available course begins March 6, 2023 and continues to June 7, 2023. It meets on Monday and Wednesdays from 6:00 p.m. to 9 p.m. I have spoken to her Pre-Trial Services officer, Jonathan Lettieri who has no objection to this request. The class is a "hybrid" class which would require some portion to be online. After consultation with Officer Lettieri, it is respectfully requested that she be permitted limited internet access only for the purposes of participating in this class.

I have spoke to Assigned Assistant United States Attorney Kaiya Arroyo regarding this request. She has expressed that she has strong reservations about Ms. Gomez accessing the internet and objects to the proposed modification. Alternatively, she proposed a modification that would allow access to the internet under the following conditions:

1. The defendant is permitted to access one internet-enabled device that must be registered/identified to pretrial services.
2. The defendant is permitted to access the registered device for the sole purpose of accessing the course.
3. The registered device must be subject to monitoring by pretrial services.
4. The registered device must be subject to search by pretrial services upon reasonable suspicious that the defendant used the device for purposes other than the hybrid class.

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Ms. Gomez's primary objective is to participate in this class and if these proposed conditions would achieve that end, she will abide, as she has done throughout her supervision, by any condition this Court should impose.

With respect to attending the class in person, should the Court grant this request, Ms. Arroyo wanted Ms. Gomez to remain subject to location monitoring at all times and to only leave her home with the approval of pre-trial services. Both of these conditions are already in place and this request would not affect those conditions.

Ms. Gomez respectfully requests Your Honor modify her conditions as described so that she may participate in the pharmacy technician course at Hostos Community College.

Sincerely,



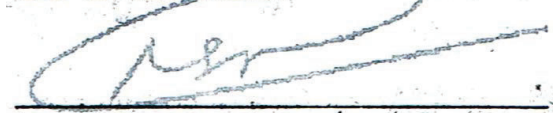
Elizabeth K. Quinn
Assistant Federal Defender
Counsel for Ysenni Gomez

cc: Kaiya Arroyo, AUSA

Deft. Ysenni Gomez's request to modify the terms of her bond conditions to permit her to participate in a pharmacy technician class through Hostos Community College is GRANTED in accordance with the modifications that would allow access to the internet under the conditions #1 through #4 suggested herein by AUSA Kaiya Arroyo and without objection by the Pretrial Services Officer. Ms. Gomez shall remain subject to location monitoring at all times and to only leave her home with the approval of pre-trial services. Clerk of Court is requested to terminate the motion at ECF No. 22.

**Dated: White Plains, NY
March 6, 2023**

SO ORDERED:



**HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE**